

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Andrew Green and Shirley Green, as  
legal guardians of N.G. (a minor child)  
and Andreia Samoria Green

Plaintiffs,

v.

Kanye West; Getting Out Our Dreams,  
II, LLC; UMG Recordings, Inc. a/k/a  
Universal Music Group; Def Jam  
Recordings; Cydel Young d/b/a Mr.  
Redan Music a/k/a Mr. Redan; BMG  
Rights Management (US), LLC a/k/a  
BMG Platinum Songs US and John Does  
1-30;

Defendants.

Case No. 2:19-cv-00366-RMG

**Plaintiffs' Expert Disclosure**

Pursuant to Fed. R. Civ. P. 26(a)(2) (and as a supplement to Plaintiffs' responses to Defendants' discovery requests), Plaintiffs disclose the following experts:

**Judith Finell**  
**Judith Finell MusicServices, Inc.**  
**4712 Admiralty Way**  
**Suite 918**  
**Marina Del Rey, CA 90292**  
**310.301.3338**

Ms. Finell, a musicologist, is expected to testify as to the contributions of the Green Samples to "Ultralight Beam". Quantitatively, Ms. Finell is expected to testify that based on a spectrogram analysis, 14.89% of "Ultralight Beam" contains the Green Samples. Ms. Finell may also be asked to testify as to the qualitative contribution of the Green Samples to "Ultralight Beam" and/or "The Life of Pablo".

**Michael Einhorn, Ph.D.**  
**3 E. Nob Hill Drive**  
**Roseland, NJ 07068**  
**973.618.1212**

**Dr. Einhorn, an economist, is expected to testify as to Plaintiffs actual damages under 17 U.S.C. 503. Due to a lack of financial data from the Defendants, his opinions cannot be disclosed at this time, but will be supplemented.**

**Although not retained experts, Plaintiffs reserve the right to elicit opinions from any of the witnesses named by any party to the extent that they are experts in their field relative to the incident that is the subject of this litigation. Plaintiffs also reserve the right to elicit opinions from expert witnesses named or retained by any other party.**

Pursuant to stipulation of the parties, Plaintiffs' experts' written reports under Fed. R. Civ. P. 26(a)(2)(B) will be provided after receipt of Defendants' financial data.

Plaintiffs reserve the right to move to waive or otherwise excuse their performance under Fed. R. Civ. P. 26(a)(2)(B).

Dated: 01/31/2020

/s/ Jason Scott Luck  
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